

SC NAACP v. Alexander,
Case No. 3:21-cv-03302-MGL-TJH-RMG

EXHIBIT D

**PORTIONS OF THIS EXHIBIT HAVE BEEN
SUBMITTED TO THE COURT FOR *IN CAMERA*
REVIEW PURUSANT TO THE CONSENT
CONFIDENTIALITY ORDER (ECF NO. 123)**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THE SOUTH CAROLINA STATE CONFERENCE OF
THE NAACP, et al.,
Plaintiffs,
vs. CASE NO. 3:21-cv-03302-MBS
TJH-RMG
THOMAS C. ALEXANDER, et al.,
Defendant.

VTC
DEPOSITION OF: WALLACE HERBERT JORDAN, JR.
VOLUME II - Pages 225 through 444
(Appearing by VTC)
DATE: July 21, 2022
TIME: 10:03 a.m.
LOCATION: Nexsen Pruet Law Firm
1230 Main Street, 7th Floor
TAKEN BY: Counsel for the Plaintiffs
REPORTED BY: Susan M. Valsecchi, CRR
Registered Professional Reporter
(Appearing by VTC)

1 therefore, you know, not be something that South
2 Carolinians as a whole can be proud of.

3 Q. And in order to ensure a map is not
4 racially biased, who did you rely on to make that
5 determination?

6 A. I mean, again, I think you bring your
7 own set of knowledge and understanding to the table
8 and then you rely on other members of your team,
9 members of the Ad Hoc Committee. I mean, you know,
10 everyone's participation in this process is
11 important.

12 Q. I know we talked earlier about partisan
13 considerations. Was maintaining a 6:1 Republican
14 advantage in congress at all a criteria factor for
15 the Ad Hoc Committee in creation of this map?

16 A. No.

17 Q. What about the term "core retention"?

18 A. I would put core retention, you know,
19 with some of the other technical terminology we've
20 used today; I have a layman's opinion of it but I'm
21 not a technical expert.

22 Q. Is the term core retention mentioned at
23 all in the redistricting criteria?

24 A. I don't believe so.

25 Q. I think you mentioned Ms. Dean would

1 trying to answer the question to the best of my
2 ability. And I guess I carried some of my previous
3 knowledge through the committee process,
4 specifically with Representative Bernstein's
5 questions, that I gave that answer.

6 Q. But I guess, as even just a step back,
7 why was it important for you to emphasize that
8 partisan groups were not involved in the drafting?

9 A. I guess because the question had come
10 up a couple times and therefore I felt like it
11 was -- needed to be part of the answer.

12 Q. And why do you think it was beneficial
13 to not have partisan groups involved in the
14 drafting of the plan?

15 A. To me, it's always made more sense, you
16 know, as members of the General Assembly, we are
17 tasked with the responsibility of completing
18 redistricting.

19 Now, certainly we'll take input, as we
20 did in this process, through various organizations,
21 but ultimately the responsibility falls to the
22 General Assembly.

23 And it's not a partisan task; it's
24 a statewide process, that we didn't necessarily
25 need any help from a partisan group.